

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

NEIL ZLOZOWER,

Plaintiff,

v.

**THE ROCK AND ROLL HALL OF FAME
AND MUSEUM, INC.,**

Defendant.

Case No. 1:24-cv-01817

Judge Christopher A. Boyko

Magistrate Judge Jennifer Dowdell
Armstrong

**DEFENDANT THE ROCK AND ROLL HALL OF FAME AND MUSEUM, INC.'S
MOTION FOR JUDGMENT ON THE PLEADINGS**

Pursuant to Fed. R. Civ. P. 12(c), Defendant The Rock and Roll Hall of Fame and Museum, Inc. ("RRHOF"), respectfully moves the Court to enter judgment on the pleadings in its favor. As explained more fully in the accompanying Memorandum in Support, RRHOF is entitled to judgment because its use of Plaintiff's photograph constituted permissible fair use.

Respectfully submitted,

/s/ Nathan B. Webb

Nathan B. Webb (0084506)
Stephen J. Knerly, Jr. (0025280)
Jacqueline A. Meese-Martinez (0099603)
HAHN LOESER & PARKS LLP
200 Public Square, Suite 2800
Cleveland, Ohio 44114
Tel: (216) 274-2213
Fax: (216) 274-2203
Email: nwebb@hahnlaw.com
sjk@hahnlaw.com
jmeese-martinez@hahnlaw.com

*Counsel for Defendant The Rock and Roll Hall of Fame
and Museum, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing *Motion* and *Memorandum in Support of Motion for Judgment on the Pleadings* was served via the Court's CM/ECF service on this 4th day of August 2025, upon all registered participants.

/s/ Nathan B. Webb

Nathan B. Webb,

One of the Attorneys for Defendant The Rock and Roll Hall of Fame and Museum, Inc.